

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
WHEELING**

RANCEL JERAMY CROSS, Individually,
RACHEL CROSS, Individually, **RANCEL
JERAMY CROSS**, as Natural Guardian of
S.C., a minor, T.C., a minor and L.C., a
minor, and **RACHEL CROSS**, as Natural
Guardian of S.C., a minor, T.C., a minor
And L.C., a minor,

Plaintiffs,

vs.

**Civil Action No. 5:21-CV-12
Judge Bailey**

**CAM SAFETY, LLC a/k/a/ and d/b/a
XCAM; XCAM, LLC a/k/a and d/b/a/
CAM SAFETY; EQT CORPORATION;
EQT PRODUCTION COMPANY; PROFRAC
SERVICES, LLC; BOTHA TRUCKING, LLC;
JOHN DOE 1; JOHN DOE 2; and JOHN DOE 3,**

Defendants.

**PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE OF
DEFENDANTS CAM SAFETY, LLC a/k/a and d/b/a XCAM; XCAM, LLC, a/k/a and
d/b/a CAM SAFETY, JOHN DOE 1 and JOHN DOE 2**

In accordance with Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiffs, Rancel Jeramy Cross, Individually, Rachel Cross, Individually, Rancel Jeramy Cross, as Natural Guardian of S.C., a minor, T.C., a minor, and L.C., a minor, and Rachel Cross, as Natural Guardian of S.C., a minor, T.C., a minor, and L.C., a minor ("Plaintiffs"), and their counsel, respectfully provide this notice of voluntary dismissal without prejudice as to Defendants Cam Safety, LLC a/k/a and d/b/a Xcam, ("Cam Safety"), XCam, LLC a/k/a and d/b/a Cam Safety ("XCam"), John Doe 1, and John Doe 2.

Respectfully submitted,

RANCEL JERAMY CROSS, Individually,
RACHEL CROSS, Individually, **RANCEL
JERAMY CROSS**, as Natural Guardian of
S.C., a minor, T.C., a minor and L.C., a

minor, and **RACHEL CROSS**, as Natural
Guardian of S.C., a minor, T.C., a minor
And L.C., a minor,

Plaintiffs,

Date: January 26, 2022

By: /s/ Christopher J. McCabe, Esq.
Scott S. Blass (#4628)
Christopher J. McCabe (#13652)
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cmccabe@bordaslaw.com
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

Service of the foregoing PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE OF DEFENDANTS CAM SAFETY, LLC, a/k/a and d/b/a XCAM; XCAM, LLC, a/k/a and d/b/a CAM SAFETY, JOHN DOE 1 and JOHN DOE 2 was had upon the Defendants herein on the 26th day of January, 2022, by filing electronically with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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*Counsel for EQT Corporation
And EQT Production Company*

Service of the foregoing PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL was had upon the unrepresented Defendants herein on the 26th day of January, 2022 by regular U.S. mail to:

XCam, LLC
PB Box 1336
Granbury, TX 76048
Defendant

Cam Safety, LLC
P.O. Box 1366
Granbury, TX 76058
Defendant

By: /s/ Christopher J. McCabe, Esq.
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